

UNITED STATES OF AMERICA
Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Experimental Changes to Implement)
Capital One NSA)

Docket No. MC2002-2

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORY TO UNITED STATES POSTAL SERVICE
(OCA/USPS-10)
November 15, 2002

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits an interrogatory and request for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-2 dated October 3, 2002, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-10. OCA submitted interrogatory OCA/USPS-T2-16 to witness Plunkett on October 21, 2002. In that interrogatory OCA questioned witness Plunkett about the Postal Service's NSA agreements with international customers (a fact that he noted in USPS-T-2 at 1, l. 21). In his response to interrogatory 16 (filed October 31, 2002), witness Plunkett states that he has "not studied agreements with international customers" and does not indicate familiarity with such agreements. Please provide an institutional response to the questions posed in interrogatory 16 based upon consultation with officials who are knowledgeable about international mail agreements.

- (a) Please confirm that the Postal Service has entered into "customer-specific pricing arrangements" with one or more international mail customers that accomplish one or more of the "three distinct goals" identified at page 1, l. 6-9, of USPS-T-2. Fully explain any negative answer.
- (b) Please identify the number of "customer-specific pricing arrangements" concluded between the Postal Service and its international mail customers that accomplish one or more of the "three distinct goals" identified at page 1, lines 6-9, of USPS-T-2, by distinct goal. Fully explain any negative answer.
- (c) Please identify the number of "customer-specific pricing arrangements" concluded between the Postal Service and its international mail customers that accomplish all "three distinct goals" identified at page 1, l. 6-9, of USPS-T-2. Fully explain any negative answer.